UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISIO

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

APPLIES TO ALL CASES

Case No. 1:17-MD-2804

Hon. Dan A. Polster

<u>DEFENDANTS' NON-OPPOSITION TO PLAINTIFFS' MOTION FOR EXTENSION</u> <u>OF TIME TO RESPOND TO PLAINTIFFS' FACT SHEETS ON BEHALF OF</u> COUNTIES AFFECTED BY RECENT NATUAL DISASTERS

Defendants do not oppose Plaintiffs' motion to extend by 45 days the current deadline of December 17, 2018 (until January 31, 2019) for those Plaintiffs that are counties affected by recent natural disasters to respond to the Plaintiff Fact Sheet.

DATED: December 7, 2018 Respectfully submitted,

/s/ Mark S. Cheffo

Sheila L. Birnbaum Mark S. Cheffo

Hayden A. Coleman

DECHERT LLP

Three Bryant Park 1095 Avenue of the Americas

New York, NY 10036

Telephone: (212) 698-3500

Facsimile: (212) 698-3599

Sheila.Birnbaum@dechert.com

Mark.Cheffo@dechert.com

Hayden.Coleman@dechert.com

Attorneys for Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company

/s/ Charles C. Lifland (consent)

Charles C. Lifland Sabrin Heron Strong

O'MELVENY & MYERS LLP

400 S. Hope Street Los Angeles, CA 90071 Telephone: (213) 430-6000 Facsimile: (213) 430-6407 clifland@omm.com

sstrong@omm.com

Attorneys for Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.

/s/ Steven A. Reed (consent)

Steven A. Reed Eric W. Sitarchuk Rebecca J. Hillyer

MORGAN LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
steven.reed@morganlewis.com
eric.sitarchuk@morganlewis.com
rebecca.hillyer@morganlewis.com

Brian Ercole

MORGAN, LEWIS & BOCKIUS LLP

200 South Biscayne Boulevard, Suite 5300

Miami, FL 33131

Telephone: (305) 415-3000 Facsimile: (305) 415-3001 brian.ercole@morganlewis.com

Attorneys for Teva Pharmaceuticals U.S.A., Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc.

/s/ Jonathan L. Stern (consent)

Jonathan L. Stern

ARNOLD & PORTER KAYE SCHOLER LLP

601 Massachusetts Ave. NW Washington, DC 20001 Telephone: (202) 942-5000 Facsimile: (202) 942-5999

jonathan.stern@arnoldporter.com

Sean O. Morris

ARNOLD & PORTER KAYE SCHOLER LLP

777 S. Figueroa St., Suite 4400 Los Angeles, CA 90017 Telephone: (213) 243-4000 Facsimile: (213) 243-4199 sean.morris@arnoldporter.com

Attorneys for Endo Health Solutions Inc. and Endo Pharmaceuticals Inc., Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc. f/k/a Par Pharmaceutical Holdings, Inc.

/s/ Donna M. Welch (consent)

Donna M. Welch, P.C.

KIRKLAND & ELLIS LLP

300 North Lasalle Chicago, Illinois 60654 Telephone: (312) 862-2000 donna.welch@kirkland.com

Attorneys for Allergan Finance LLC f/k/a Acatvis, Inc. f/k/a Watson Pharmaceuticals, Inc.

/s/ J. Matthew Donohue (consent)

J. Matthew Donohue Joseph L. Franco

HOLLAND & KNIGHT LLP

2300 U.S. Bancorp Tower 111 S.W. Fifth Avenue Portland, OR 97204 Telephone: (503) 243-2300 matt.donohue@hklaw.com joe.franco@hklaw.com Nicholas A. Sarokhanian

HOLLAND & KNIGHT LLP

200 Crescent Court, Suite 1600

Dallas, TX 75201

Telephone: (214) 964-9500

nicholas.sarokhanian@hklaw.com

Attorneys for Insys Therapeutics, Inc.

/s/ Brien T. O'Connor (consent)

Brien T. O'Connor

Andrew J. O'Connor

ROPES & GRAY LLP

Prudential Tower

800 Boylston St.

Boston, MA 02199-3600

Telephone: (617) 235-4650

Brien.O'Connor@ropesgray.com

Andrew.O'Connor@ropesgray.com

Attorneys for Defendant Mallinckrodt LLC and SpecGX LLC

/s/ Daniel G. Jarcho (consent)

Daniel G. Jarcho

ALSTON & BIRD LLP

950 F Street, N.W.

Wasthington, D.C. 200004-1404

(202) 239-3254

Daniel.jarcho@alston.com

Attorneys for Noramco, Inc.

/s/ Enu Mainigi (consent)

Enu Mainigi

F. Lane Heard III

Steven M. Pyser

Ashley W. Hardin

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

Fax: (202) 434-5029

emainigi@wc.com

lheard@wc.com

spyser@wc.com

ahardin@wc.com

Counsel for Cardinal Health, Inc.

/s/ Robert A. Nicholas (consent)

Robert A. Nicholas

Shannon E. McClure

REED SMITH LLP

Three Logan Square 1717 Arch Street, Suite 3100 Philadelphia, PA 19103 Telephone: (215) 851-8100

Fax: (215) 851-1420

rnicholas@reedsmith.com smcclure@reedsmith.com

Counsel for AmerisourceBergen Drug Corporation

/s/ Geoffrey Hobart (consent)

Geoffrey Hobart Mark Lynch Christian Pistilli

COVINGTON & BURLING LLP

One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: (202) 662-5281 ghobart@cov.com mlynch@cov.com cpistilli@cov.com

Counsel for McKesson Corporation

/s/ James W. Matthews (consent)

James W. Matthews

Redi Kasollja

FOLEY & LARDNER LLP

111 Huntington Avenue

Boston, MA 02199

Telephone: (617) 342-4000 Facsimile: (617) 342-4001 jmatthews@foley.com rkasollja@foley.com

Counsel for Anda, Inc.

/s/ William E. Padgett (consent)

William E. Padgett Kathleen Matsoukas

BARNES & THORNBURG LLP

11 South Meridian Street Indianapolis, IN 46204 Telephone: (317) 236-1313

Fax: (317) 231-7433

william.padgett@btlaw.com kmatsoukas@btlaw.com

Counsel for H.D. Smith, LLC f/k/a H.D. Smith Wholesale Drug Co.

/s/ Tara A. Fumerton (consent)

Tina M. Tabacchi Tara A. Fumerton

JONES DAY

77 West Wacker Chicago, IL 60601

Telephone: (312) 269-4335

Fax: (312) 782-8585 tfumerton@jonesday.com

Counsel for Walmart Inc.

/s/ Eric R. Delinsky (consent)

Eric R. Delinsky Alexandra W. Miller

ZUCKERMAN SPAEDER LLP

1800 M Street, NW

Suite 1000

Washington, DC 20036 Telephone: (202) 778-1800

Fax: (202) 822-8106

edelinsky@zuckerman.com smiller@zuckerman.com

Counsel for CVS Indiana, L.L.C. and CVS Rx Services, Inc.

/s/ Kelly A. Moore (consent)

Elisa P. McEnroe

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: (215) 963-5000

Elisa.mcenroe@morganlewis.com

Kelly A. Moore

MORGAN, LEWIS & BOCKIUS LLP

101 Park Avenue

New York, NY 10178

Tel: (212) 309-6612

Fax: (212) 309-6001

kelly.moore@morganlewis.com

Counsel for Rite Aid of Maryland, Inc.

/s/ Kaspar Stoffelmayr (consent)

Kaspar Stoffelmayr

Matthew W. Brewer

BARTLIT BECK LLP

54 West Hubbard Street, Suite 300

Chicago, IL 60654

Telephone: (312) 494-4434

Fax: (312) 494-4440

kaspar.stoffelmayr@bartlit-beck.com matthew.brewer@bartlit-beck.com

Counsel for Walgreen Co. and Walgreen Eastern

Co.

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record registered to receive electronic Notices of Electronic Filing by CM/ECF.

/s/ Mark S. Cheffo